

EXHIBIT 1

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William Entrekin*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SEAN K. CLAGGETT & ASSOCIATES, LLC
D/B/A CLAGGETT & SYKES LAW FIRM, A
NEVADA LIMITED LIABILITY COMPANY;
SEAN K. CLAGGETT, AN INDIVIDUAL

Plaintiffs,

v.

DON C. KEENAN, AN INDIVIDUAL; D.C.
KEENAN & ASSOCIATES, P.A. D/B/A
KEENAN LAW FIRM, A GEORGIA
PROFESSIONAL ASSOCIATION; KEENAN'S
KIDS FOUNDATION, INC., D/B/A KEENAN
TRIAL INSTITUTE AND/OR THE KEENAN
EDGE, A GEORGIA NON-PROFIT
CORPORATION; BRIAN F. DAVIS, AN
INDIVIDUAL; DAVIS LAW GROUP, P.A., A
NORTH CAROLINA PROFESSIONAL
ASSOCIATION; DAVID J. HOEY, AN
INDIVIDUAL; TRAVIS E. SHTLER, AN
INDIVIDUAL; WILLIAM ENTREKIN, AN
INDIVIDUAL; DOES I-X; AND ROE
BUSINESS ENTITIES XI-XX, INCLUSIVE,

Defendants.

Case No.: 2:21-cv-02237-GMN-DJA

**DECLARATION OF WILLIAM
ENTREKIN**

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1 I, WILLIAM ENTREKIN, hereby state and declare as follows:

2 1. My name is William Entrekkin. I am one of the named defendants in this
3 action. I am over the age of 18, suffering from no legal disabilities, and fully competent
4 to give this declaration.

5 2. I have personal knowledge of the facts set out in this declaration, which I
6 submit on my own behalf in support of the Motions to Dismiss filed by me and co-
7 defendants Don C. Keenan; D.C. Keenan & Associates, P.A. d/b/a Keenan Law Firm
8 ("Keenan Law Firm"); Keenan's Kids Foundation, Inc., d/b/a Keenan Trial Institute
9 and/or The Keenan's Edge ("Keenan Trial Institute"); and David Hoey.

10 3. I am, and at all times relevant to the complaint in this matter was, a
11 resident and citizen of, and domiciled, in Dahlonaga, Georgia, a city located
12 approximately sixty-five miles north of Atlanta.

13 4. I have been employed by co-defendant the Keenan Law Firm for over nine
14 and a half years, serving initially as Executive Assistant beginning in July 2012 and four
15 months later becoming Director of Operations in October 2012, a position that I have
16 held continuously since then.

17 5. Keenan Law Firm is a Florida professional association having offices
18 located at 148 Nassau Street NW, Atlanta, Georgia 30303 and at 174 Watercolor Way,
19 Suite 103, Box 339, Santa Rosa Beach, Florida 32459.

20 6. I primarily work from the Atlanta office of Keenan Law Firm, and prior to
21 the start of the pandemic I would travel to the Florida office two to three times a year.

22 7. Prior to joining Keenan Law Firm, I served for over twenty-three and a half
23 years as Security Officer for the US Navy, of which I am a veteran.

24 8. I am not an attorney, and my experiences in the legal services industry for
25 Keenan Law Firm have consisted only of administration and operations management.

26 9. I do not maintain a "continuous and substantial presence in the State of
27 Nevada through the conduct of regular business, sales, services, marketing, and/or
28 seminars / trainings in the State."

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1 10. I have only been to the state of Nevada once when in or around 2003,
2 while I was stationed with the Navy in San Diego, I spent a vacation weekend in Las
3 Vegas staying at a hotel at Nellis Air Force Base and visiting the city.

4 11. I have not lived, worked, or otherwise engaged in any persistent course of
5 conduct in Nevada.

6 12. The Amended Complaint in the Nevada Action alleges only that, on April
7 27, 2020, I sent an email from co-defendant David Hoey through Listserv to lawyers
8 across the country (the "April 27 Email").

9 13. Listserv is an application that distributes messages to subscribers on an
10 electronic mailing list.

11 14. My only activities with respect to the April 27 Email consisted of my
12 sending the content of the email in my capacity as Director of Operations of Keenan
13 Law Firm to the recipients of that electronic mailing list. I did not create, draft, or
14 approve the content of the April 27 Email. All my actions occurred from within the state
15 of Georgia, not Nevada. The April 27 Email allegedly forms the basis of the First,
16 Second, and Third Counts of the Complaint which are the only counts of the Complaint
17 that name me as an individual defendant.

18 15. I am not named as an individual defendant on the Fourth, Fifth, Sixth and
19 Seventh Counts of the Complaint (for intentional interference with contract, intentional
20 interference with prospective economic advantage, conspiracy, and veil piercing) which
21 allegedly arise from the purported termination of an attorney-client relationship between
22 plaintiffs and a third party. I was not involved in any way with the subject of the
23 purported termination of the attorney-client relationship.

24 16. As alleged in plaintiffs' Nevada Amended Complaint, the April 27 Email
25 was sent to all state Edge listservs around the country (not uniquely to the Nevada
26 listserv). The listserv is not open to the general public, but instead is a closed
27 environment of lawyers who have served as instructors, students, or otherwise attended
28 or participated in an event or seminar hosted by Keenan Trial Institute. The April 27

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1 Email was sent after the filing of the Georgia Action, and the allegedly defamatory
2 matter concerned, and was pertinent to, the Georgia litigation. [Am. Compl. at ¶¶ 53-54]

3 17. I have never owned, leased, or otherwise occupied any real property in
4 Nevada.

5 18. I have never had any personal property located in Nevada.

6 19. I have never maintained any offices, other facilities, or agents, or had any
7 employees in the state of Nevada.

8 20. I have never served as an agent or had a registered agent for service of
9 process in the state of Nevada.

10 21. I have never had a bank account in Nevada. Nor have I ever filed any
11 financing statements, borrowed any money, or maintained any banking relationship in
12 Nevada.

13 22. I have never had a telephone listing or mailing address in Nevada.

14 23. I have never incurred or paid any taxes in Nevada; nor have I ever filed
15 any tax return in Nevada.

16 24. I have no employees or independent contractors in Nevada.

17 25. I have never advertised in the state of Nevada.

18 26. Except for this case, I have never been a party to litigation in any state or
19 federal court in Nevada.

20 27. I have never committed any torts or other wrongdoing in whole in in part in
21 Nevada. Nor do plaintiffs in their Nevada Complaint allege any tortious acts or other
22 wrongdoing by me in Nevada.

23 28. Individuals who may serve as witnesses for me on which I may rely to
24 support my defenses or claims include me, Mr. Keenan, Mr. Hoey, and Mindy Bish,
25 among others, all who are located in Georgia, Florida, or Massachusetts, outside the
26 state of Nevada. Additionally, the documents relevant to this litigation are located in
27 Georgia and Florida.

28 ///

1 29. I would be significantly inconvenienced to have to defend this action
2 nearly 2,000 miles from my home base in Georgia. It would be much easier for me to
3 litigate this matter in the Northern District of Georgia (Atlanta Division) where my
4 employer the Keenan Law Firm has an office, I am domiciled, amenable to and would
5 accept service, and witnesses and documents related to this litigation are located.

6 I declare under penalty of perjury under the law of the state of Nevada that the
7 foregoing is true and correct.

8 Executed on January 26, 2022 in Dahlonaga, Georgia.

9
10 By: 
11 William Entrekin

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